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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DIANE SANCHEZ,

Plaintiff,

vs.

WINDHAVEN NATIONAL INSURANCE
COMPANY, a domestic corporation;
WINDHAVEN NATIONAL INSURANCE
COMPANY fka ATX PREMIER
INSURANCE, a domestic corporation; DMA
CLAIMS INC., a foreign corporation; BLAS
BON, an individual; DOES I-X and ROE
CORPORATIONS I-X, inclusive,

Defendants.

CASE NO.: 2:19-cv-02196-RFB-VCF

**STIPULATION AND [PROPOSED
ORDER] FOR EXTENTION OF
TIME TO FILE OPPOSITION TO
DMA CLAIMS, MANAGEMENT,
INC.'S MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff DIANE SANCHEZ, through her counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendant DMA CLAIMS, INC., by and through its counsel of record, Robert E. Schumacher and Wing Yang Wong of GORDON REES SCULLY MANSUKHANI, LLP, that the deadline for Plaintiff to file her Opposition to DMA Claims Management, Inc.'s Motion to Dismiss First Amended Complaint (ECF No. 27) shall be extended by fourteen (14) days, from April 17, 2020 to May 1, 2020. The Motion



1 was filed on April 2, 2020. This Stipulation and [Proposed Order] is submitted in
2 accordance with LR IA 6-1.

3 This matter is stayed as to Defendants Windhaven National Insurance Company
4 and Blas Bon resulting from the filing of the Order Appointing Liquidator, Permanent
5 Injunction and Notice of Automatic Stay. (ECF No. 25, 25-1). Plaintiff and DMA Claims
6 Management, Inc. currently dispute the scope of the automatic stay as it relates to DMA
7 Claims Management, Inc. Following a telephone conference regarding this issue,
8 Plaintiff informed DMA Claims Management, Inc. of her intent to file a motion with the
9 Court to clarify this issue. Plaintiff is in the midst of preparing this motion. DMA
10 Claims Management, Inc. also plans to file a motion to address this issue.

11 Plaintiff's counsel has also been preparing and finalizing an opening appellate
12 brief to the Nevada Supreme Court in the matter of *Evans-Waiiau et al. v. Tate*, Case No.
13 79424. Due to the extensive work associated with the same, additional time is needed
14 for Plaintiff to adequately respond to DMA Claims Management, Inc.'s Motion to
15 Dismiss. Accordingly, the parties respectfully request this Court to approve the
16 foregoing stipulation. Their requested extension is not made in bad faith.

17 DATED this 17th day of April, 2020.

DATED this 17th day of April, 2020

18 **PRINCE LAW GROUP**

**GORDON REES SCULLY MANSUKHANI,
LLP**

19 /s/ Dennis M. Prince

/s/ Win Yan Wong

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Attorneys for Plaintiff

Attorneys for Defendant

Diane Sanchez

DMA Claims, Inc.

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IT IS SO ORDERED:

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 21st day of April, 2020.

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2020.

UNITED STATES DISTRICT JUDGE

